

ALASKA NATURAL GAS DEVELOPMENT AUTHORITY  
GLENNALLEN TO PALMER PIPELINE  
ADL 229297

**ATTACHMENT B**  
**RESPONSE TO COMMENTS**

The following table identifies issues of concern that were expressed by the public and the ADNR's responses to those concerns. These concerns may or may not have resulted in the ADNR making changes to the Conditional Right-of-Way Lease agreement.

	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
	<b>ACCESS</b>	
1.	Access related issues should be identified and resolved prior to construction.	<p>R &amp; M Consultants did a study for ANGDA that addressed recreational and other access issues including long-term access for construction and maintenance activities. That study is available on line at <a href="http://www.jpo.doi.gov">www.jpo.doi.gov</a>.</p> <p>Access roads for the project will be authorized through a separate public process under AS 38.05. The Preliminary Decision for the AS 38.05 road right-of-way permit(s) will address access roads. Issues identified during the public process will be addressed in the Final Decision, prior to issuance of the road right-of-way permit(s).</p>
2.	Determine the maintenance (short and long term) cost for maintaining the service and access roads to and along the pipeline corridor.	<p>DNR does not evaluate these costs. However, the cost of maintaining roads will be addressed in ANGDA's business plan. The business plan is a "living" document that will be updated on a regular basis. The costs for a particular road may change yearly.</p>

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3.	Construction is a short term impact. Long term impacts will be from the increased access.	The Commissioner may allow the Lessee to: (1) restrict or limit public access during construction, operation and maintenance, or termination activities;(2) regulate or prohibit public access to areas of the right-of-way to facilitate operations or to protect the public, wildlife, or livestock from hazards associated with the operation of the pipeline; or (3) regulate or prohibit public access for reasons related to the security of the pipeline system. The long-term impacts associated with improved access as a result of the project were addressed in the Commissioner's Analysis and Proposed Decision and Action dated February 24, 2006. Individual access road right-of-way permits will address use of the road and whether or not the road is available for unrestricted public use. Also see response to comment number 13.
4.	Discuss the management and regulation of the corridor and access points.	While the Lessee and Commissioner will use best efforts to determine the locations of limited access prior to construction, there may be instances where access will need to be limited in the future due to security or for safety reasons.
5.	Will entry and use of the area be limited? Block access to motorized use near residential areas. Access to the corridor should be disallowed to prevent impacts.	The Commissioner may restrict public access to the pipeline right-of-way or to the road rights-of-way for operation and maintenance or public and wildlife safety purposes.  See response to comment number 13.
6.	Need to have detailed information on how ANGDA will access this gas line right-of-way and how the gas line and access roads will be managed.	Access road locations will be determined during the final design phase of the pipeline. Management of access roads has been discussed in response to comments 1 through 5.

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7.	ANGDA proposes to go behind Sheep Mountain, along Squaw Creek, Caribou, Chitna and Boulder Creeks, traversing some of the best habitat in the area for Dall sheep. Concerned this will open new access for ATVs in an already overused area.	Construction of a pipeline right-of-way may open new or improve access to vehicular traffic, such as ATVs. The Right-of-Way Lease will have stipulations to address the public's use of the pipeline right-of-way. ADNR may require the ANGDA to restrict vehicular access to protect the integrity and/or security of the pipeline system and/or as may be necessary to facilitate the maintenance, repairs and/or operation of the pipeline system. Access could be limited using various methods, such as but not limited to, boulders, berms, gates, and trenches.
8.	Increased access and construction will destroy wetlands, fish habitat, scenic view and trails that haven't already been destroyed by four-wheelers.	Prior to issuing a Right-of-Way Lease a determination on whether to allow access to the right-of-way or portions of the right-of-way will be made by the Commissioner. This decision will be based on comments received from agencies, local governments including Tribal governments, and the public. Construction of the gas pipeline will require permits and authorizations from both federal and state resource agencies. In addition, the Right-of-Way Lease will contain stipulations designed to minimize impact to wetlands, fish habitat, trails and scenic views.
9.	Access is hard to enforce because a four-wheeler can easily get away and are very mobile.	Generally allowed uses of state land are listed in 11 AAC 96.020. The regulation allows <i>using a recreational-type off-road or all-terrain vehicle with a curb weight of up to 1,500 pounds, including a snowmobile and four-wheeler, on or off an established road easement if use off the road easement does not cause or contribute to water quality degradation, alteration of drainage systems, significant rutting, ground disturbance, or thermal erosion</i> .The ADNR recognizes that use of lands by four-wheelers/ATVs can be hard to enforce.
10.	Requested access routes and locations at the public hearings but have not received the information.	At this time, access road locations have not been identified. The roads on state land will be authorized under AS 38.05.850 and will undergo a separate public process. Decisions will be written by ADNR addressing access roads and the public will be offered the opportunity to comment on those decisions.

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11.	Limit access to Tribal lands with assurance developed to protect the wildlife areas that the Tribal governments have been working to protect while the state and its peoples are quickly diminishing the wildlife populations with increasing immigrants, military and industry/commerce.	<p>ADNR does not have the authority to limit access on Tribal lands. The Conditional Right-of-Way Lease, Right-of-Way Lease and the road right-of-way permits apply only to state lands managed by ADNR. If the ANGDA determines they need to use Tribal lands, ANGDA will negotiate with the Tribal governments. The ADNR will not be a party to those negotiations.</p> <p>Additionally, stipulations in the Right-of-Way Lease will require the Lessee to comply with Alaska Statute Titles 16 and 41 with respect to the protection of fish and game.</p>
12.	Address the construction of access roads and routes; service and maintenance roads, routes and access points.	See response to comment number 1.
13.	New roads and trails should not be allowed. Opening the right-of-way to ATV and recreational vehicle traffic would cause substantial impacts in terms of disturbance, hunting, pressure, pollution and habitat loss. A “road closed” sign won’t do the trick. If the right-of-way is cleared, people are going to use it.	Access roads, whether currently existing or constructed by the Lessee, may, with the Commissioner’s approval, have limited access during construction and termination activities. At all other times, unless the Lessee receives written permission from the Commissioner to restrict access for operation and maintenance or public or wildlife safety purposes, the access roads must remain open to the public. If public access is limited on existing highways, trails or access roads, the Lessee must provide an alternative route. The Lessee must also provide appropriate warnings and safety measures when using existing roads or when limiting public access.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
14.	Access issues are a concern. If the pipeline were to stay in an existing corridor then it would be less of a concern.	Whenever possible, the ANGDA has realigned the right-of-way to utilize existing rights-of-way and easements in response to comments and suggestions received during their public outreach meetings. The Commissioner has highlighted these changes in his final decision.
15.	Geographic formations are good natural barriers and keep much of the area free of off-road vehicles. Currently, access is very difficult to upper Caribou Creek beyond the confluence of Alfred Creek. Recommend incorporating measures that limit the pioneering of new access routes for recreation off-road vehicle use in this remote habitat unless it is developed as part of a unit-wide, multiple land owner/user group planning process.	Stipulations in the Right-of-Way Lease will be developed and may limit access to areas of concern. New access routes on state land by groups or individuals, such as 4-wheeler or Jeep clubs, must be done through the application under AS 38.05. The Commissioner supports land management planning efforts involving local communities. See response to comment number 13.
16.	DNR should require a more detailed analysis of how construction and maintenance access will be provided without new roads.	See response to comment number 1. Access roads are not a part of the Conditional Right-of-way Lease. Roads are authorized under AS 38.05 and have not been identified at this time. The location of access roads will be applied for after the final location of the pipeline is defined. If existing roads or trails are used, they may require upgrading in order to accommodate heavy equipment.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
	<b>ALIGNMENT</b>	
17.	Determine the pipeline alignment prior to issuing a lease.	ANGDA has submitted a revised alignment with changes reflecting public comment.
18.	Changes have been made to the pipeline alignment because of concerns of individuals and the community councils in the areas.	ANGDA has worked with the various community councils and individuals along the proposed route. Changes have been made to the alignment based on the comments received. The revised alignment is available at <a href="http://www.jpo.doi.gov">www.jpo.doi.gov</a> for review. Additional revisions may be made prior to issuance of the Right-of-Way Lease.
19.	Oppose the entire route from Glennallen to Palmer, including through Chickaloon Pass. The route is a blatant disregard for the national scenic area that the proposed route goes through.	The Glenn Highway was designated a scenic byway in June, 2000 by the Alaska Department of Transportation and Public Facilities. It was also designated as a National Scenic Byway by the U.S. Department of Transportation's Federal Highway Administration (FHWA) National Byways Program in June, 2002. These designations recognize the beauty of the route. The National Scenic Byways Program, established by Congress in 1991 and administered by the FHWA, was created to preserve and protect the nation's scenic byways and, at the same time, promote tourism and economic development. Participation in the program is voluntary and may encompass any public road or highway. It does not limit the use of adjacent lands. The programs are designed to work with existing state and local regulations. The byway programs do not require local financial investment nor do they infringe upon individual private property rights.
20.	Forget the Glennallen to Palmer route.	Comment is noted by ADNR.
21.	Proposed route is a "spur line from nowhere" and will be constructed years prior to the main gas line.	The ANGDA pipeline is intended to tie into the main gas line from Prudhoe Bay. The ANGDA has stated if necessary they will construct an additional segment from Delta Junction to Glennallen or a "bullet line" from Glennallen to Prudhoe Bay in order to get gas to Southcentral Alaska. These proposals are not a part of this project.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
22.	ANGDA plans to continue the spur line on to Delta Junction if the main pipeline does not go through Glennallen.	The ANGDA has proposed to continue the pipeline to Delta Junction if the main gas line does not go through Glennallen. However, that proposal is not part of this decision.
23.	Proposed route from Glennallen to Palmer appears to be the best both geographically and geologically.	Comment is noted by ADNR.
24.	DMLW recommends the pipeline be located on the south side of the Glenn Highway within Sections 25, 26, 27, 33, and 34, T4N, R6W, CRM or to place the pipeline within the 300 foot buffer of state retained lands between the northern edge of the Glenn Highway right-of-way and the Ridgeview Subdivision and Remote Staking project.	The pipeline has been moved to the south side of the Glenn Highway, across from the Ridgeview Subdivision. (Alignment Sheet 5).Impacts to the subdivision should be limited to the construction phase. Traffic will be controlled while half of the road is closed for pipeline installation and may temporarily interrupt traffic. The pipeline will not cross the Glenn Highway on its surface but may be crossed with road-boring.

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25.	The pipeline should not leave the highway or enter Squaw Creek, Caribou Creek, Chitna Pass and Boulder Creek areas. This area has high wildlife, scenic and recreational values that will be displaced by the utility corridor proposed.	The GLENN HIGHWAY SCENIC BYWAY 2003 Visitors Map lists some of the visual resources from Palmer to Glennallen that include historical, cultural, and recreation areas, scenic overlooks, trailheads, lodges, roadhouses, a Paleontologic Interpretive Wayside and the raptor viewing site. These resources will not be impacted by the buried pipeline. The buried pipeline will be within existing right-of-way corridors and trails and should not detract from the visual resources along the Glenn Highway and Caribou Creek area. Also see response to comment number 19.
26.	Governor Murkowski has publicly endorsed the Parks Highway as the preferred route.	Comment is noted by ADNR.
27.	Consider moving this section of the pipeline to follow the highway down Moose Creek Canyon, to rejoin the proposed course toward Palmer from Soapstone.	The Moose Creek Canyon area is very steep terrain and would be impossible to securely construct a pipeline within the highway right-of-way. The highway continues to have problems with erosion and falling rocks. Engineers do not recommend placing oil or gas pipelines within this type of terrain. Additional engineering options are planned.
28.	The Glennallen to Palmer and the Glennallen to Delta Junction lines would not be necessary if the pipeline were constructed along the Parks Highway.	Should the Parks Highway route come to fruition prior to construction of the Glennallen to Palmer line, the Glennallen to Palmer pipeline may not be constructed. The Parks Highway route is currently being studied. The study is expected in the fall of 2006. This route does not have an active application for the public to review.

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29.	Chickaloon Village Traditional Council (CVTC) would like to work with ANGDA to construct a road up the Kings River from Permanente Road through and to Tribal lands, as well as other lands. This road would benefit both ANGDA and the Tribe.	The ANGDA has expressed an interest in working with the Tribal council regarding this access point and has publicly stated they will continue to work with the Tribal council as the project progresses. The ANGDA is considering the Glenn Highway-King River access point.
30.	If the right-of-way is approved, completely avoid the Chitna Pass and Boulder Creek Area. The Chickaloon Village Tribal Council and their ancestors have resided, hunted, fished and seasonally migrated through the Chitna Pass and Boulder Creek corridor and it is sacred to the Tribe.	The ADNR recognizes the importance of Chitna Pass and the Boulder Creek area to the Chickaloon Village Tribal Council, their ancestors and others that are not Tribal members. The pipeline will be designed in a manner to minimize impacts to the environment, wildlife and fish in the area. A Cultural Resource Plan will be implemented prior to any pre-construction or construction activities taking place that may impact cultural or historical resources.

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31.	Keep the pipeline in the Glenn Highway right-of-way. What is the justification for deviating from the road? The proposed route is about 20 miles north of the existing highway and is not acceptable. The pipeline must be routed on the highway right-of-way or south of the highway.	The ANGDA has worked with the ADOTPF regarding the use of the Glenn Highway right-of-way. In several locations, the highway right-of-way width will not accommodate both the highway and the pipeline in several areas especially those areas next to the river. ANGDA has explored other areas where the pipeline could go and this is the route selected.
	<b>PARKS HIGHWAY AND RAIL BELT ROUTE</b>	
32.	Parks Highway route from Fairbanks makes more sense. Right-of-way is already in place from Fairbanks to Wasilla via Parks Highway.	A right-of-way for pipeline from Fairbanks to Wasilla, also known as the Parks Highway Pipeline, has not been issued. Enstar, ASRC Constructors, Inc. and Michael Baker Engineering are working on a \$4 million Parks Highway Spur Line Project feasibility study funded by the Department of Energy. This study will address the feasibility and conceptual engineering work on two options, the Parks Highway and the Richardson/Glenn Highway route.

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33.	Study the entire Glenn Highway corridor, the Parks Highway Corridor, a corridor from Fairbanks to Paxton, across on the Denali Highway and down the Parks Highway.	The Parks Highway route is being studied, as stated in comment response number 32. ANGDA also contracted with Bristol Environmental and Engineering Services Corporation to prepare a study comparing the attributes of seven route alternatives. The report is titled <i>Permitting Comparison of Parks Highway and Glenn Highway Natural Gas Pipeline Rights-of-Way</i> and is dated October 2005, and is available on-line at <a href="http://www.angda.state.ak.us">www.angda.state.ak.us</a> . The point of beginning for all alternatives was Pump Station 7 of the TransAlaska Pipeline and the terminus was the Enstar Natural Gas Company's existing infrastructure near Palmer. All of the routes anticipated using existing ROWs and trails to some degree. Use of existing ROWs is favored over disturbance or new areas. Only the TAPS-Stevenson route alternative would have significant construction in a roadless/trailless area.
34.	Deny the conditional right-of-way lease and urge ANGDA to consider an alignment following the George Parks Highway.	Comment is noted by ADNR. See response to comments 32 and 33 for more information.
	<b>APPROVE CONDITIONAL LEASE</b>	
35.	Support responsible resource development and utilization.	The ADNR also supports responsible resource development and utilization. Right-of-Way Lease Stipulations will be designed to protect the environment and the resources along the pipeline. The stipulations will be developed in conjunction with the Right-of-Way Lease.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
36.	Support the granting of a Conditional Right-of-Way Lease from Glennallen to Palmer. The pipeline is in the best interest of the Copper Valley and the State of Alaska.	Comment is noted by ADNR.
37.	Support the efforts of ANGDA in getting the route permitted and moving along so it can be prepared to branch off of a gas line from the North Slope of Alaska to bring gas into the Southcentral area.	Comment is noted by ADNR.
38.	Get the gas to Port Mackenzie, which is capable of handling world class ships that could carry gas.	If a gas pipeline is constructed from Glennallen to Palmer the line could be extended to Port Mackenzie and Kenai for distribution to other areas.
39.	Approve this Conditional Right-of-Way Lease.	Comment is noted by ADNR.
40.	The Matanuska Susitna Borough fully supports any economic diversity to lower natural gas costs for Borough residents. Health, welfare and safety of the Borough residents are a main concern.	The ADNR appreciates the support of the Matanuska Susitna Borough. Health, welfare and safety are also concerns of the ADNR. The Right-of-Way Lease stipulations will be developed to address these issues in more detail.

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41.	The Mental Health Trust Land Office has affirmed the Matanuska Valley Competitive Coal Lease Offering, TLO 92-39, in the area between the Chickaloon River and the King River for coal mining. Coal mining is definitely not in the best interest of the gas pipeline nor in the best interest of the potential lessees for coal mining.	The ADNR does not manage Mental Health Trust Lands. The Mental Health Trust Lands Office is responsible for authorizing use of their lands. The application that is currently being reviewed is for state lands managed by the ADNR, not other agencies, trusts, or corporations within state government. The Mental Health Trust Lands Office has been kept informed of all pipeline route changes, which include those that may affect their land.
42.	Usibelli Coal Mine, Inc. (UCM) has actively pursued development of a coal mine in the Wish Bone Hill area near Moose Creek. Two of the alternative realignments would cross the coal mine area. For this reason, UCM objects to the project.	The ANGDA talked with a representative from Usibelli Coal Mine, Inc. regarding Usibelli's proposal to develop the Wish Bone Hill coal mining area. The alternate realignments proposed have been eliminated by ANGDA and the route shown on alignment sheet 22 is the proposed route. Usibelli Coal Mining, Inc. has indicated this route is acceptable.

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43.	Blasting vibrations from the mining process may directly affect the gas pipeline depending on the separation distance. The proximity of the mine and the pipeline will determine the amount of explosives that may be used during mining, which could adversely affect mining operations.	After obtaining additional information during the open houses held in March, 2006, the ANGDA determined the original alignment proposed in this area would be the best route. A meeting with a Usibelli representative was held after the open houses. The Usibelli concurred the original pipeline alignment is the best option for their coal mining project. The design of the pipeline, including the pipe thickness, will take into consideration explosives that will be used to mine the coal. The Code of Federal Regulations 49 CFR 191-192 addresses Natural Gas Pipelines, pipe thickness in different classes of lands for safety reasons.
	<b>GLENN HIGHWAY, EXISTING RIGHTS-OF- WAY AND EASEMENTS</b>	
44.	Construct the pipeline within existing telephone, power lines and highway rights-of-way whenever possible. This would create the least amount of destruction to the natural resources and would provide the least disturbance to any housing, roads, etc. along the way.	The ANGDA is utilizing existing rights-of-way and easements, including power line easements, as much as possible to reduce the impact to the environment and residents.
45.	What justifies deviation of the pipeline from the highway?	Some areas of the Glenn Highway Right-of-Way will not accommodate a gas pipeline because of the terrain. See response to comment number 31 for additional information.

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46.	What consideration has been given to ANGDA acquiring a right-of-way or easement on other lands near the highway right-of-way?	The ANGDA may approach individual land owners regarding the use of their lands for, i.e., temporary staging areas, lay down areas, etc., including lands adjacent to the highway. The proposed pipeline right-of-way follows existing rights-of-way and easements to the extent possible. Some terrain will not accommodate both the highway and the gas pipeline. See response to comments 31, 44 and 45 for additional information.
47.	Place the pipeline on the south side of All Elks Road on State land and within an existing power line right-of-way. The north side of All Elks Roads is mostly private property.	The ANGDA made alignment changes to place the pipeline on the south side of All Elks Road on State land, reducing impacts to the private properties on the north side of the road.
48.	Rights-of-way over private lands will be required to complete this project. The state has a policy when adjudicating rights-of-way and easement applications that before they issue rights-of-way over state land, the applicant must show they have the concurrence or permission from the all land owners along the route.	<p>The Right-of-Way Leasing Act, AS 38.35, only pertains to lands owned by the State. If ANGDA wants to utilize privately owned lands, including utility companies, city, borough, or native-owned lands, the ANGDA will negotiate with the landowner. The ADNR encourages applicants to work with the private land owners to obtain the authorization but is not a party to the negotiations.</p> <p>A Conditional Right-of-Way Lease does not give the ANGDA a property interest in state land. It provides ANGDA with a document which provides guidance for obtaining a Right-of-Way Lease and is a document that can be used to discuss financing of the project with lending institutions.</p>

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49.	State land is available along the north boundary of Section 6 and down the western boundaries of Sections 6 and 7. The existing power line corridor in Section 4 could also be used.	In response to comments made during the ANGDA open houses and during the ADNR public hearings, the ANGDA moved the pipeline alignment to state land, wherever possible, and within the power line corridor.
50.	Forget the Glennallen to Palmer route. The most practical and least invasive route, (culturally, socially and logically) is along the existing State Inter-tie, from either Fairbanks or Fort Wainwright or along the Parks Highway. The line could be taken to the port at Point Mackenzie.	ENSTAR, ASRC and Michael Baker Engineering, are working together on a \$4 million study of the Parks Highway Spur Line Project. The study is funded by \$2 million from the Department of Energy and \$2 million from the SAFETEA LU Highway Bill. The ANGDA is working in cooperation with ENSTAR, ASRC and Michael Baker on the feasibility and conceptual engineering work on the two options (Glenn Highway route and Parks Highway route). The study is expected to be released in late summer of 2006. See response to comment numbers 32 and 33 for additional information.
51.	The highway route may have less long term impacts because it could be incorporated into “on-going” highway improvements. The current highway could aid in the construction and maintenance of the pipeline and reduce long term costs associated with maintaining two corridors from Palmer to Glennallen.	If the terrain were conducive to accommodating both the highway and a pipeline, the preferred option would be to place the two infrastructures within the same right-of-way or adjacent to the existing highway right-of-way. Parts of the Glenn Highway are constructed in terrain that could not accommodate a road and pipeline, such as the Glacier View area. Therefore, the ANGDA deviated from the highway right-of-way to areas that are better suited for a pipeline. See response to comment 31 for additional information.

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52.	Opposed to permitting the Glennallen to Palmer route and support using the existing right-of-way from Fairbanks.	See response to comment numbers 32 through 34 for information on the Parks Highway route study.
	<b>EUREKA, CHITNA PASS, BOULDER CREEK, KINGS RIVER</b>	
53.	Chitina Pass is steep, rugged and prone to avalanches, mudslides, and flooding.	Chitina Pass will provide some challenges for construction because of the terrain. Because the pipeline will be buried, avalanches and mudslides will not impact the pipeline. The proposal is to place the pipeline on a ridge that is not subject to flooding. Final alignment may be amended based on field studies.
54.	The area behind Sheep Mountain is a highly scenic hiking route. ATV traffic impairs wilderness experiences. Construction of the gas line will lead to motorized recreation and a negative effect on the wilderness experience. Wildlife and habitat would be negatively impacted.	Access routes in this area are presently used and have been used for at least the past 50 years by mechanized equipment, including but not limited to, bulldozers, trucks and lowboys to haul mining equipment. The routes are used concurrently by recreational and hunting communities.  Alpine areas are important for hunting Dall sheep, moose, bear, caribou and other animals. The area contains mineral resources including gold, silver, copper other metallic minerals and limestone. Mineral licks, known for the past several hundred years, will be protected. Access to trails and to mineral licks will not be blocked. Existing mining claims will not be impacted. The area will remain in public ownership for wildlife protection, hunting and recreation opportunities.
55.	Eureka, once prime caribou habitat, now is snow machine habitat.	The ADNR acknowledges that recreational use of the Eureka area has increased over the years. This increase is not related to the proposed pipeline project.

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56.	Opposed to the pipeline being routed through the Boulder Creek area.	Comment is noted by ADNR.
57.	State of Alaska must display a “good neighbor policy” in place of pipeline economic reasons to protect the area west from Eureka to Palmer.	The ANGDA, or their contractors, have held public outreach meetings and open houses in communities along the Glenn Highway in an effort to be “a good neighbor”. These meetings/open houses have provided the ANGDA with additional information and have resulted in the pipeline realignment in many cases.
	<b>CITIZENS OVERSIGHT GROUP</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
58.	Establish and fund a Citizens' Oversight Group to see the project through from beginning to end (design /construction/ operation). With an Environmental Review Committee to oversee issues like wildlife, erosion and stream crossing and a socio-economic subcommittee to oversee local hire, job training, cultural resource protection and that the maximum benefit flows to Alaskan communities. This group and the subcommittees should be funded by the State/ANGDA but be independent of ANGDA.	The Conditional Right-of-Way Lease and the Right-of-Way lease do not require a Lessee to create a group, such as a Citizen's Oversight Group. The ADNR has statutory requirements to ensure the public is kept apprised of a project using the public notice process established in statute.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
59.	Build continuing public, tribal and agency review into the lease by including <ul style="list-style-type: none"><li>▪ Ten year right-of-way renewal requirement,</li><li>▪ Citizens advisory council, along the lines of RCAC or Cook Inlet Keeper</li><li>▪ Ongoing tribal consultation.</li></ul>	<p>The ANGDA applied for a Conditional Right-of-Way Lease, which can be issued for a term not to exceed 10 years. During the 10 year term, the applicant must establish they are fit, willing and able to perform the transportation or other acts proposed in a manner that will be required by the present or future public interest. The Right-of-Way Leasing Act, AS 38.35, allows ADNR to issue a renewable Pipeline Right-of-Way Lease for a term of 30 years.</p> <p>The ANGDA may determine a citizen’s advisory council is in their interest. The ADNR would not require ANGDA to establish a group.</p> <p>The ADNR agrees that tribal consultation is important and will continue to consult with the Tribe throughout the remainder of the process.</p>
	<b>RECREATIONAL AND VISUAL IMPACTS</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
60.	The pipeline currently proposes to cross Moose Creek Canyon above ground where the power line crosses and will be in full sight of Buffalo Mine Road. The power line is visible from the road but is not as visible as the pipeline will be. The pipeline will be visible from the best scenic lookout point on the entire road and will ruin the view. What measures can be taken to make the pipeline not visible from Buffalo Mine Road?	<p>The Chickaloon Village Traditional Council, in collaboration with other agencies and the local community is working to restore fish passage and to improve the habitat on Moose Creek. (<a href="http://www.chickaloon.org">http://www.chickaloon.org</a>). The ANGDA is working with the Tribal Council to cross Moose Creek in a manner that will not impact the fish passage restoration work they are doing. This may include suspending the pipe over the creek. Should this method of crossing be selected, the ANGDA will do what it can to reduce the visual impacts from the Buffalo Mine Road and other scenic lookouts. The Conditional Right-of-Way Lease will require the preparation of a Visual Resources Plan to address how ANGDA will prevent or mitigate, to the extent practicable, impacts to visual resources during pre-construction, construction, operation and maintenance, and termination activities. This plan must be approved by the ADNR.</p> <p>See response to comment number 27 for additional information.</p>
61.	The proposed route goes through a highly scenic hiking route. Require a plan that addresses impacts to recreation.	The pipeline will be primarily buried and should not adversely impact hiking or other recreational activities during operation and maintenance of the pipeline. Trails or roads may be temporarily closed during construction. Temporary trails or roads may be required to maintain public access to recreation areas during construction.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
62.	Involve communities in the construction planning and process and possibly funding community projects along the right-of-way. These communities will be negatively impacted by the unsightly swath of the right-of-way without any benefits to the community.	The ANGDA welcomes the public to their monthly board meetings, where the proposal is discussed, and to submit comments/suggestions in writing at any time. ANGDA realizes that any construction project has an impact on communities and residents in the area. ANGDA plans to fund, develop, equip, train and staff minor emergency medical facilities in select communities to be used during pipeline construction. The facilities and equipment will remain at the respective locations for use by the area residents after construction is completed. Funding, support, equipment maintenance and personnel training will be the communities' responsibility after construction is completed.
63.	The pipeline goes through an area where we pick berries.	The Caribou Creek and Boulder Creek areas are popular for berry picking. The Conditional Right-of-Way Lease will require the ANGDA to provide a Clearing Plan detailing clearing methods for pre-construction, construction, operation and maintenance activities. The plan shall include methods addressing disposal, utilization or storage of slash and overburden, timber and other vegetation. In addition, buffer zones and visual effects shall be addressed. The plan shall also include brushing methods for the operational phase of the pipeline system. Mitigative measures, such as replacing overburden, may help the berry plants to reestablish in the area. The plan must be approved by ADNR.
	<b>PRIVATE PROPERTY INCLUDING AHTNA, CVTC, AND MENTAL HEALTH</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
64.	Take private property trespass into consideration.	The Commissioner's Analysis, Proposed Decision and Action pertain only to state lands. Any action taken by the State will not grant the ANGDA the right to access private lands; rather the ANGDA will be responsible for negotiating for access and use of all private lands, including commercial lands, along the right-of-way route.
65.	Four-wheelers have destroyed trails on state and private lands such as Purinton Creek Trail and Pinochle. Bikers and hikers can no longer enjoy these trails.	Use of four-wheelers on trails can cause damage to trail and make them less attractive to bikers and hikers. There are a number of historic access routes that are heavily used year-round, especially in the Matanuska Valley Moose Range and Nelchina Public Use Area. Under regulation, rights-of-way and easements on state land are available for public use.
66.	The maps show that within Section 7, a number of private properties (5-five acre parcels, 2-ten acre parcels and 1-forty acre parcel in addition to homes and apartment buildings) will be impacted or lost to material sites.	This location has been identified and has been removed as a potential material source. Final material site locations have not been identified by ANGDA at this time. Further research must be done by ANGDA to determine the potential material sites and the land ownership. Material sites on state land will be applied for and processed under AS 38.05. If materials are located on privately owned lands, the ANGDA will negotiate with the property owner(s).
67.	ADNR should make sure that ANGDA has done all it can do to avoid private property. Do not issue any lease until the ANGDA has reached an agreement with the affected property owners, such as an agreement to purchase, lease or pay for material.	The Conditional Right-of-Way Lease and the Right-of-Way Lease applies only to State lands. Private property owners must negotiate with ANGDA regarding the use of their lands. Any action taken by the State will not grant the ANGDA any rights to private lands; rather the ANGDA will be responsible for negotiating for use of all private and commercial lands along the right-of-way route, including the right of access.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
68.	Property owners in the area are unaware of the long term impacts that may occur and are uninformed on access road locations.	Access roads have not been identified. Adjacent land owners will be notified when ANGDA applies for access roads on State land. Any roads that are located on private property must be negotiated with the land owner.
69.	Glennallen to Palmer route would directly impact significant numbers of privately owned properties, including the Kings River area where there is adjacent State land.	The ANGDA has realigned the pipeline to state land and to existing rights-of-way and easements. The Conditional Right-of-Way Lease and the Right-of-Way Lease applies only to State lands. Private property owners must negotiate with ANGDA regarding the use of their lands. Any action taken by the State will not grant the ANGDA the right to access private lands; rather the ANGDA will be responsible for negotiating for use of and access across private lands.
70.	AHTNA is the only group that will benefit from the Glennallen line.	AHTNA is a land owner in the Glennallen area that could benefit from the pipeline. Residents of the Copper Valley could benefit through the reduction of electric costs if CVEA converts their generation plants to natural gas. If propane is stripped from the gas liquids in Glennallen and/or Palmer, the residents would have access to less expensive propane. The State as a whole will benefit from the construction and operation of the pipeline through the collection of tariffs, taxes and other fees.
71.	Do not grant the state right-of-way before the private land owners are contacted and polled as to their willingness to lease their lands. If this isn't possible, the state should prohibit any "taking" of private land through eminent domain.	The ADNR has attempted to notify property owners that may be impacted by this project. The Commissioner may, under AS 38.35.130, delegate the function of eminent domain to a Lessee to acquire land if the land is required for pipeline right-of-way purposes. Title to land taken through condemnation or eminent domain will vest in the State. AS 41.41.200(5) authorizes ANGDA to acquire property through the power of eminent domain. See response to comment number 67 for additional information.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
72.	Private property along the right-of-way will be impacted by ATVs, Jeep clubs and other users. There already is a gross misuse of the Jonesville trail system, Kings River trail system, Permanente trail system and Puritan Creek system.	The ANGDA and ADNR are interested in minimizing impacts to residents of the area. The ANGDA has held public outreach meetings to acquire information from individuals in the area. The public made recommendations during the ANGDA public outreach meetings /open houses to build construction access roads that can be easily closed/vacated, revegetated, and reclaimed, and, where appropriate and practical, use existing trails. Some individuals would like to see the trails reclaimed to a higher standard than the trails were prior to construction.
73.	State projects belong on State lands. Private lands belong in the hand and control of the individuals who have purchased the land.	The Conditional Right-of-Way Lease will be issued only for State land and will not include privately owned lands. The ANGDA will need to negotiate with the landowner regarding the use of their lands.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
74.	Garbage and human waste control along the trails and this right-of-way is a major concern. Who will be responsible for keeping the area clean?	<p>The ANGDA will be responsible for garbage and human waste created during construction, operation and maintenance and termination activities. A plan detailing the methodologies used to minimize human/carnivore interactions must be submitted for approval by the ADNR. Predator/infrastructure relationships may be addressed in this plan – particularly the effective handling of all waste so as to not attract predators to the pipeline and associated infrastructure. The plan will also include measures to provide employees with training on avoiding human/carnivore interactions.</p> <p>The ADEC has the statutory responsibility for preventing air, land and water pollution. Written permits, such as solid waste disposal, wastewater or air quality permits, are typically required before an activity can begin. Domestic grey-water must be disposed of properly at the surface and a Wastewater Disposal Permit is required pursuant to 18 AAC 72. ADEC sets fluid volume limitations and threshold concentrations for biochemical oxygen demand (BOD), suspended solids, PH, oil and grease, fecal coliform and chlorine residual. Monitoring records must be available for inspection and a written report may be required upon completion of operations.</p> <p>The ANGDA may determine it is in their best interest to involve communities in cleaning up after recreationalists, including 4-wheeler users. This is not a requirement that will be included in the Conditional Right-of-Way Lease or the Right-of-Way Lease.</p>
	<b>WILDLIFE AND HUNTING</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
75.	Sheep Mountain is some of the best habitat for Dall sheep, caribou and moose. A plan should be required to study and address the impacts of the pipeline to the wildlife.	Because the pipeline will primarily be buried, impacts to Dall sheep, caribou and moose would take place during construction. ADF&G will be consulted on timing and other measures to mitigate potential impacts to wildlife resources. Construction in the eastern section and special areas, such as wetlands, will take place in the winter which will reduce impacts to migratory patterns, lambing and calving.
76.	The Talkeetna Mountains should be managed for quantity and quality of wildlife resource so it will continue to be a quality experience for the next 100 years and beyond.	The ADNR has taken actions to protect the quantity and quality of wildlife in the area. The Matanuska Valley Moose Range along the southern edge of the Talkeetna Mountains north of Palmer and Sutton, was created in 1984 to protect and enhance moose habitat while permitting other land uses. AS 16.20.340 designated management of Moose Range “...to maintain, improve and enhance moose populations and habitat and other wildlife resources of the area and to perpetuate multiple use of the area, including...mineral and coal entry and development and other forms of public uses compatible with these purposes.” The primary uses are designated for fish and wildlife. Secondary uses include forestry and grazing.
77.	The Talkeetna Mountains contain a high concentration of Dall Sheep that mix with sheep in the Chugach Mountain Range, directly south of the highway. A lack of snowfall is the reason for the high concentration of sheep in the area. Very few sheep live on the far western end of the Talkeetna Mountains due to the extreme snowfall.	Visual monitoring will detect construction activities that may adversely impact wildlife. The project will be maintained to avoid significant alteration of large mammal movement patterns. The buried pipeline design and construction techniques will minimize environmental consequences. Construction noise, vibrations, equipment movement, and human presence may temporarily disturb animals and alter their travel patterns. Operation and maintenance activities will be monitored to reduce impacts to the animals and their travel patterns.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
78.	Update Habitat standard from 6 AAC 80.130 to 11 AAC 112.	This correction is noted and corrected by reference.
79.	<p>Revise “<i>Description of Resources and Existing Uses along the ANGDA Project Route, Wildlife</i>” to include a reference to fish and wildlife resource information contained within the April 12, 2005, ANGDA Glennallen to Palmer Spur Gas Pipeline Environmental Report.</p> <p>Update <i>ANGDA Environmental Report – Glennallen to Palmer Spur Gas Pipeline, April 12, 2005 – Impacts to Wildlife</i> to include current wildlife distribution information within the area</p>	The Environmental Report is a document produced by an ANGDA contractor. These comments were forwarded to ANGDA.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
80.	The portion of the pipeline that veers away from the Glenn Highway from Boulder Creek to Sheep Mountain (Game Management Unit 13A) cuts through key caribou, moose, grizzly bear, Dall sheep and wolverine habitat.	The operation and maintenance activities associated with the buried pipeline should not impact wildlife in Game Management Unit 13A. Construction will be conducted in a manner that reduces impacts that could occur during break-up and freeze-up. Winter construction will be used in areas with permafrost and extensive wetlands. Winter construction using ice and snow pads to support vehicles and equipment reduces impacts to native soils and vegetation. During construction, methods will be used to minimize wildlife impacts.
81.	Nelchina Caribou Herd (NCH) calves in the Nelchina Public Use Area, and has been documented through the calving and post-calving period (May 15 to July 30) in the Upper Caribou Creek drainage. Concentrations of post-calving caribou have been found on a regular basis from the Upper Oshetna River, south to Mazuma Creek and into Caribou Creek.	The pipeline will primarily be buried. Impacts to the Nelchina Caribou Herd (NCH) would take place during construction. Construction will be timed to reduce impacts to their migratory patterns.
82.	Caribou generally avoid construction activities and travel routes. Construction may need to be timed or modified to minimize potential impacts on calf survival.	Wildlife migration and impacts from construction will be a consideration when determining a construction timeline.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
83.	Historic hunt records reveal the importance of the entire area from Chickaloon, east to the Syncline Mountains, for Tier II caribou hunters. Caribou hunting begins August 10 <sup>th</sup> .	The Alaska Board of Game regulates hunting, including Tier II hunts. Concerns regarding the allocation of and the competition for game resources, proposals can be submitted to the Board of Game.
84.	Moose calve throughout the Boulder Creek to Sheep Mountain. The calving period is particularly vulnerable period and extends from May 15 to June 15.	Calving periods will be taken into consideration when developing the construction schedule to reduce impacts to the calving and lambing seasons.
85.	In 2004, 300 hunters pursued moose from Boulder Creek to Sheep Mountain and 70 moose were harvested. Both general season hunters and Tier II hunters consistently use this area. Moose hunting begins August 15 <sup>th</sup> .	The Board of Game regulates allocation of the game resources. Construction timelines will take into consideration other uses along the right-of-way, including hunting.
86.	Moose remain above tree line in the high country until mid-December to late-January. The Boulder Creek to Sheep Mountain area then becomes a migration corridor for moose.	During pipeline operation and maintenance, moose, caribou and other animals should not be impacted by the pipeline because the pipeline will be buried. In areas that may be above ground, measures will be taken to ensure animals will be able to migrate or cross the pipeline. These measures may include things such as placing the pipeline on vertical support members a distance from the ground that would allow passage of the wildlife, including moose and caribou.

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87.	Grizzly bears may be found throughout the Boulder Creek to Sheep Mountain area. They are most vulnerable to construction activities during their hibernation period (October 15 to April 30). Bears may have a hard time surviving the winter if disrupted during hibernation.	The ANGDA will work with the ADF&G to reduce impacts to bears. In addition, the lease will require a human/carnivore interaction plan from ANGDA prior to beginning construction activities. Construction in denning areas may not take place during winter when bears are hibernating.
88.	High country is critical denning habitat for sows with young cubs.	See response to comment number 87.
89.	Earlier work with radio-collared bears indicated bear dens occur throughout the proposed route area.	See response to comment number 87.
90.	The proposed alignment cuts through prime sheep habitat. In 2003, nearly 1,100 Dall sheep were observed in the area. In 2004, nearly 200 sheep hunters pursued sheep in this area, with over 30 rams harvested. The sheep hunting season begins August 10th.	The ADFG and ADNR/OHMP will have an opportunity to comment on the location of the pipeline in relation to sheep habitat. The information submitted by other agencies will be considered prior to the ADNR issuing a Notice to Proceed.

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91.	Sheep must have continual access between Sheep Mountain and Syncline Mountains just to the north across Squaw Creek. Construction activities in this drainage should be conducted in a manner that minimizes restrictions to sheep movements. Upper Caribou Creek and Boulder Creek support the highest concentrations of sheep year-round for the Boulder Creek to Sheep Mountain area.	Pipeline construction will be timed to reduce impacts to the sheep movements. The pipeline will be primarily buried, which should not restrict the movement of sheep.
92.	Increased winter snow machine access around critical sheep wintering habitat and escape cover could result in an increase in overwinter mortality; particularly by creating a packed trail making easier travel for wolves and coyotes.	The pipeline right-of-way may increase access for snow machines. The ADNR Generally Allowed uses defined in 11 AAC 96.020 allows activities employing wheeled or tracked vehicles. The activities must: (1) be conducted in a manner that minimizes surface damage; (2) vehicles must use existing roads and trails whenever possible; (3) activities must be conducted in a manner that minimizes (A) disturbance of vegetation, soil stability, or drainage systems; (B) changing the character of, polluting, or introducing silt and sediment into streams, lakes, ponds, water holes, seeps, and marshes; and (C) disturbance of fish and wildlife resources, in addition to other conditions. Use of the right-of-way may improve access for wolves, coyotes and other predatory animals to sheep, moose, and caribou.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
93.	The eastern Talkeetna Mountains is excellent wolverine habitat and is important as a source population for maintaining wolverine numbers in the Copper River Basin.	The Conditional Right-of-Way Lease will require the ANGDA submit a plan detailing the methodologies that will be used to minimize human/carnivore interactions. The wolverine and other predator/infrastructure relationships may be addressed in this plan – particularly the effective handling of all waste so as to not attract bear, fox, wolverine or other predators to the pipeline and associated infrastructure. The plan will also include measures to provide employees with training on how to avoid human/carnivore interactions.
94.	The eastern Talkeetna Mountains is a raptor migratory corridor and nesting area. It is important habitat for nesting golden eagles. Cliffs are suitable for nesting because of their physical structure and proximity to large numbers of neonatal sheep and caribou that are heavily utilized as prey for the first two months of nesting by eagles.	Raptor nesting will be a consideration when determining the construction timeline. The USF&WS and ADF&G will be consulted on migratory bird protection and avoidance measures prior to commencement of construction activities.
95.	If the pipeline passes through Chitna Pass and Boulder Creek, the traditional subsistence resources will be destroyed.	The Commissioner is required under AS 38.35.100 to protect the interests of individuals living in the general area of the right-of-way who rely on fish, wildlife and biotic resources of the area for subsistence purposes. The Commissioner has required ANGDA, as a condition of the Conditional Right-of-Way Lease, to develop measures for protecting qualified subsistence resources and their uses in the vicinity of the proposed activity

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96.	Tribal lands are closed to moose hunting on the south side of the Matanuska River. Yet, every year there are carcasses everywhere. Opening up new area will exacerbate the taking of animals on the north side of the river.	The ADF&G regulates hunting, under the direction of the Board of Game, in Alaska and has the authority to ticket individuals who hunt illegally. Poaching or the illegal killing of animals occurs worldwide for many different reasons. Animals are killed illegally for their meat, skins and internal organs as well as, for sport and accidental killing.
97.	The area off the Glenn Highway is one of the major bread basket areas in Alaska. Historically this country has put as much food on the table per capita or per square mile as compared to anywhere in Alaska. Estimate that 90 percent of Alaska does not produce the amount of game that is in this area.	The ANGDA Spur Line Environmental Report prepared by ASRC Energy Services, Lynx Enterprises, Inc. dated April 12, 2005, recognizes that the annual harvest of moose in the area is typically one of the largest in the state. Moose are present throughout the area. Calving and wintering habitat are considered particularly critical. Lowlands support relatively high concentrations of calving moose, and riparian habitat along river drainages constitute essential moose wintering range. The Environment Report acknowledges that vegetation clearing of the right-of-way corridor could result in a direct loss of some moose habitat. Loss of winter habitat along riparian habitats would be the most important to local moose populations. Some habitat loss may occur.
98.	Will there be hunting restrictions and wildlife management modifications.	Construction of this pipeline should not change hunting restrictions or change the wildlife management. The Board of Game sets hunting restrictions with the ADF&G making recommendations to the Board.

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99.	Moose habitat will be impacted. Four-wheel access to the moose areas will impact the area and the moose will become a vision of the past. The moose will not be able to get away from the four-wheelers or four-wheel drive vehicles.	Visual monitoring during construction will detect activities that may adversely impact fish or wildlife. The project will be operated and maintained to avoid significant alteration of large mammal movement patterns. The buried pipeline design and construction techniques can minimize environmental consequences. Noise, vibrations, equipment movement, and human presence may temporarily disturb animals and may alter their travel patterns during construction. During the operational and maintenance phase, animals should not be disturbed and their travel patterns should not be altered. The ANGDA Spur Line Environmental Report prepared by ASRC Energy Services, Lynx Enterprises, Inc. dated April 12, 2005, is available on-line at <a href="http://www.jpo.doi.gov">www.jpo.doi.gov</a> .
100.	Trapper, fishermen, hunters, hikers all depend on the area west from Eureka to Palmer.	The pipeline will not minimize recreation opportunities or diminish visual or habitat values after construction is completed. A buried pipeline will not block or limit use of existing trails.
	<b>PERMAFROST, RIVERS, STREAMS AND WETLANDS</b>	

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101.	The bog south of Koenen Road feeds Carnegie Creek and ultimately Wasilla Creek. Disturbance of the water flow, oxygen content, temperature, etc. would affect more than just the bog. It acts as a water storage area for aquifers which supply, Palmer and as a nursery for micro/macro organism that are a food source for salmon in Wasilla Creek and for prey species of migratory birds on the Palmer Hay Flats. Bog can be avoided by using section line or power line easements.	<p>The Conditional Right-of-Way Lease requires the ANGDA submit a Wetlands Construction Plan describing methodologies that will be used to minimize impacts to wetland habitats. This plan will describe how impacts to drainage patterns and groundwater flow will be minimized or avoided. Clearing trees, brush and tall vegetation shall also be minimized to reduce impacts to wetlands. Construction in wetlands shall, to the extent possible, be scheduled when the ground is frozen. For wetland construction, the application for a Notice to Proceed shall include relevant information on the following: cross drainage control, erosion control, siltation control, clearing, re-grading, and revegetation.</p> <p>The ADOTPF is proposing to realign the Trunk Road. The ANGDA is working with ADOTPF to place the pipeline within the Trunk Road right-of-way. The proposal is to place the pipeline under a “bike trail”. Work on the pipeline would take place at the same time as the realignment of Trunk Road, which will reduce construction impacts to residents in the area and travel along Trunk Road.</p>
102.	Enstar looked at extending the gas lines into the Koenen Road neighborhood and felt the project was too expensive for the return because of the bog.	When ENSTAR considers extending natural gas into a neighborhood, there are a number of factors, including the terrain, they take into consideration. Some things they consider is the number of people that could be serviced, the assessment to each land owner and the number of people actually interested in obtaining natural gas. It can take a number of years, and an interest shown by the property owners, in order for gas to be extended to a new area.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
103.	Proposed route will impact countless streams and wetlands, by digging and/or dredging, that are critical habitat for moose, caribou, bears, eagles, countless bird species and smaller wildlife species.	To reduce impacts to streams and wetlands, including sedimentation and erosion, the final design will address the use of open cut, trenching or the use of horizontal directional drilling (HDD). A consideration in determining the method used for crossing streams will be the time of year construction is proposed to take place. ADNR/ OHMP will determine the method used to cross streams and rivers that are anadromous or have resident fish. Permits to avoid sedimentation and erosion are required to discharge the water used to test the pipe. The permits may require field observations, monitoring, sampling, and reporting of discharges be done the same day of discharge. Discharges are monitored to limit damage, erosion, sedimentation, and/or floating debris. Discharge locations will be determined in conjunction with the ADEC and OHMP.
104.	Damage will be permanent to wetlands that are crossed. Wetlands do not repair or “heal” for many, many years, if ever.	The proposed alignment has avoided wetlands whenever possible. Changes may be made to the alignment as field work is accomplished and additional wetlands are identified. Less damage is done to permafrost lands and wetlands if construction takes place in the winter when the ground is frozen. Construction during the winter when the ground is frozen protects the wetlands and sensitive areas. The ANGDA proposes winter construction in sensitive areas, such as wetlands. The use of ice roads and workpads are also proposed to reduce impact to the wetlands.
105.	Directionally boring and burying the gas line under all river crossings will not have long-term affects on natural water flow or the active flood plain. Revegetation of the buried gas line will ensure that natural vegetation within riparian management areas is maintained.	The use of horizontal directional drilling (HDD) to cross rivers and streams will reduce impacts and is proposed for the majority of the rivers. The Design Basis will address crossing rivers. The ADNR has identified the rivers and streams that will require HDD based on the current alignment. The Conditional Right-of-Way Lease requires ANGDA submit, for ADNR approval, a Stream, River and Floodplain Crossings Plan.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
106.	The Copper River Basin has fragile wetlands. Widespread drilling caused by outrageous demand from Mat-Su and Anchorage would cause lasting damage in the Copper River watershed.	The ANGDA proposes to construct the pipeline in the winter in sensitive areas, such as permafrost and wetlands. See response to comment numbers 104 and 105 for additional information on winter construction and the use of ice roads and workpads to reduce impacts to wetlands.
107.	Require bridges adequate for off highway vehicles over wetlands and riparian areas that the pipeline will cross to prevent negative impacts due to the increased traffic.	A wetlands report is included in the ANGDA Spur Line Environmental Report, April 12, 2005. The appendix identifies major wetland classes along the pipeline. This table identifies the wetland system, NWI class, description of the wetland and the dominant species. Additionally, the Conditional Right-of-Way Lease requires ANGDA submit to ADNR a Wetlands Construction Plan for approval.
108.	Monitor impacts during construction and after construction so wetlands impacts, water quality impacts, recreational impact can be assessed.	Monitoring will take place during construction, operation and maintenance, and termination of the Right-of-Way Lease. The Right-of-Way Lease will require plans and have stipulations designed to ensure impacts to the environment is lessened during all stages (construction, operation and maintenance, and termination activities). The Conditional Right-of-Way Lease requires a Quality Assurance/Quality Control Plan, Water Quality Monitoring Plan, Wetlands Construction Plan and other plans that directly or indirectly address wetlands, water quality and recreational uses. These plans must be submitted to ADNR for approval.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
109.	Concerned the plans will not have a clear outline of water quality and streams and how the consultants will present it to the public. Mandate ANGDA monitor water quality on streams and wetlands before, during and after construction of the pipeline.	The Conditional Right-of-Way Lease requires ANGDA to develop a Water Quality Plan. This plan must be submitted and approved by ADNR prior to beginning any construction activities. ANDR will consult with ADEC and OHMP on the technical aspects of the water quality monitoring plan and proposed stream/wetland construction methods.
110.	To protect the sensitive grounds from the infrequent pipeline maintenance vehicles as well as the frequent and heavy onslaught of ATVs, ANGDA should be mandated to build bridges over stream and wetland crossings for pipeline maintenance and monitoring, to prevent bank and ground erosion from occurring near water-bodies. The bridges can be monitored and maintained by the same group that does the trails monitoring and the maintenance crew.	The use of open cut or horizontal directional drilling (HDD) to cross streams and rivers were identified by ADNR/ OHMP as feasible means for stream and river crossing. Depending on the final design of the pipeline, the alignment and new information that may be obtained from field work accomplished, the method used to cross a stream or river may change. Use of bridges (foot, ATV or heavy equipment bridges) may be required and would be dependant on the area. Bridges could reduce long term impacts to streams and wetlands. However, it could also open areas to motorized vehicles (4-wheelers, 4-wheel drive vehicles, motorcycles, etc.) that were previously not available.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
111.	The last 30 years has proven pipelines are not going to damage stream beds.	Comment is noted by ADNR.
	<b>PERMAFROST AND SOIL TEMPERATURES</b>	
112.	Construction in pristine areas can cause the thawing of permafrost, resulting in erosion and siltation that could have a significant negative impact to fish habitat including critical spawning areas.	Permafrost, sporadic and discontinuous, is prevalent throughout the pipeline corridor. Pipeline construction between Caribou Creek and Glennallen will be done during the winter to reduce impacts to the environment. The Design Basis will consider the type of permafrost and will use engineering expertise to design the pipeline. North Slope pipelines are designed to consider the Arctic region and this expertise can be applied to this pipeline.
113.	Gas pipelines can freeze non-permafrost areas, which can make the pipeline move in a process known as “frost jacking”. If a chilled line freezes ground water and streams, fish and their eggs can die.	The Design Basis will take into consideration the type of ground that is being crossed. Prevention of frost jacking and ground freezing will be addressed in the Design Basis.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
114.	ANGDA claims a 24-inch pipeline is too small to cause “frost jacking” or freezing of non-permafrost areas. The State needs an independent and scientific evaluation of this claim.	Both thaw degradation/settlement of frozen soils and frost heave potential of unfrozen soils will be addressed in the Design Basis. The effects and potential mitigation measures for any adverse deformation will need to be addressed in the Design Basis. Additional mitigation measures may be included in the Notice to Proceed. The spur line alignment passes through significant segments of frozen ground having high variable ice content. Thermal degradation of disturbed ground through these segments will result in some allowable pipe subsidence that, combined with frost heave effects, will cause pipe movement and stress variation. See response to comment number 115 for additional information.
115.	How will the gas line temperatures effect soil temperatures? Larger diameter pipelines thaw the permafrost, resulting in erosion and siltation that harms fish. “Frost jacking” can also affect fish causing their eggs to die. Will a fish resource plan be done?	The Design Basis will address soil types, temperatures and the construction method to be used for each area. The pipeline can be designed to minimize impacts to permafrost by constructing in the winter and replacing the overburden. The Design Basis will address construction methods that will be used to protect streams and rivers from erosion. Additionally, an authorization from ADNR/OHMP is required if the pipeline crosses fish inhabited streams or river. See response to comment number 114 for additional information.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
116.	What are the potential effects of a buried cooled pipeline? What will be done to prevent negative effects in this region? Obtain independent verification from qualified engineers with experience in the discontinuous permafrost zone to verify this pipeline will not cause “frost jacking” or non-permafrost ground to freeze.	The current proposal is to transport the gas at ambient temperature which should minimize freezing/thawing of the ground. The Design Basis will address construction, operation and maintenance methods used for the pipeline. The engineer’s responsible for reviewing the document are familiar with pipeline construction, gas and oil, and the regulations, state and federal that direct construction, and operation and maintenance used. Other agencies will have an opportunity to comment on the Design Basis prior to approval by the ADNR.
117.	There are 81 miles of wetlands to be crossed between Glennallen and Palmer. The ANGDA has indicated they don’t know what the effects of a cooled pipeline will be on the wetlands (wetlands may remain frozen all summer or thawed all winter).	Known wetlands have been avoided where possible. Additional wetlands may be identified when field work is accomplished. Sporadic and discontinuous permafrost are prevalent throughout the pipeline right-of-way corridor. Arctic and sub-arctic region engineering and expertise are used to design pipelines in Alaska. Buried pipelines are feasible as long as the integrity of the frozen soils is maintained. Warming permafrost conditions will be considered in the pipeline Design Basis.
118.	Require an independent verification that the pipeline would not melt permafrost and impact soil, water and fish.	See response to comment number 117.
	<b>FISH</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
119.	From the Copper to the Matanuska and Susitna watershed, we insist the salmon habitat be completely protected. Water withdrawals and pollution from spills are two areas of special concern. Just requiring “plans” is not good enough. Neither is saying the applicable laws will be followed. Include a substantive requirement that salmon be given the highest priority.	The Conditional Right-of-Way Lease requires ANGDA submit to ADNR for approval, plans that address the protection of wetlands and watersheds from pollution due to spills. These plans will be used to develop the criteria for the Design Basis and will be applied during all phases, including construction, operation and maintenance, and termination activities. Watersheds are very important to the health of fish, both resident and anadromous. Water withdrawal and pollution will be monitored by various state agencies, including the ADEC and ADNR/OHMP. A plan addressing Erosion and Sedimentation Control is a requirement of the Conditional Right-of-Way Lease. Additionally, permits may require field observations, monitoring, sampling, and reporting of discharges to be done the same day of discharge. Discharges are monitored to limit damage, erosion, sedimentation, and/or floating debris. Discharge locations will be determined in conjunction with the ADEC and ADNR/OHMP.
120.	Require plans in the conditional right-of-way lease that studies and addresses impacts to wildlife, recreation, and fish resources.	The Conditional Right-of-Way Lease requires ANGDA prepare plans that will be used to develop the criteria for the Design Basis and will address impacts to wildlife, recreation and fish resources. Each plan has a purpose and objective and a performance standard addressing how the ANGDA will avoid, abate and diminish problems that may arise from the project. The Environmental Briefing; Clearing; Erosion and Sedimentation Control plans, are required to ensure fish, wildlife and other environmental resources are protected.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
121.	Twenty (20) years ago ARCO committed to getting natural gas to power the Star Wars Program, which is heating the ionosphere and causing global warming, which affects water temperatures and has an adverse effect on salmon runs in Alaska.	Comment is noted by ADNR.
	<b>CULTURAL RESOURCES</b>	
122.	Cultural resources along the right-of-way are also important to the Borough.	The ADNR thanks you for your comments.
123.	The SHPO can not find this project consistent with the ACMP without an approved archaeological survey and report. The survey and report must be done prior to any ground disturbing activities, including activities relating to pre-construction activities.	The ANGDA submitted an initial limited archaeological study to SHPO in October, 2005. The “redacted” version, approved by SHPO, is available on-line at <a href="http://www.jpo.doi.gov">www.jpo.doi.gov</a> . The Conditional Right-of-Way Lease requires the ANGDA to conduct a comprehensive archeological ground survey, prior to any ground disturbing activities, such as centerline staking, development of gravel sites, and staging areas for pipeline materials, taking place. The Cultural Resource Preservation Plan will be reviewed and approved by Alaska State Historic Preservation Office (SHPO) and ADNR. Any pipeline realignments, new access roads or material site locations will be reviewed for site conflicts prior to any land disruption activities taking place.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
124.	The proposed gas line goes through a historical and culturally sensitive area for the Chickaloon Village Athabascan Indians.	See response to comment number 123. The Conditional Right-of-Way Lease requires ANGDA to submit to ADNR for approval a Cultural Resource Preservation Plan. This plan will identify how cultural resources will be protected during construction, operation and maintenance or other activities. The ANGDA shall develop, establish and maintain a Cultural Resource Protection Program to preclude negative impacts to significant cultural resources by avoidance or, if this is not possible, to preserve significant data. The ANGDA will coordinate with the SHPO in the development of a project-specific Programmatic Agreement for Cultural Resource Protection.
125.	Loss of artifacts and fossils along the route is a concern. Some will be destroyed by the construction and others will be stolen.	The ADNR and SHPO are concerned about preserving artifacts and fossils along the route. Therefore, the Conditional Right-of-Way Lease requires ANGDA to submit a Cultural Resource Preservation Plan, as described in response to comments 123 and 124, to protect the cultural resources during construction, operation and maintenance or other activities relating to the pipeline.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
126.	<p>The MSB Cultural Resources Division has stated that a portion of the pipeline route will traverse an area that was settled during the Matanuska Colony of 1935 and was extensively farmed. In the Borough twenty recorded sites are within the sections through which the pipeline will pass. AHRS records contain sites/buildings that were constructed in 1917, another site built in 1936, and another mentions an artifact that could be prehistoric or historic in nature. It is difficult to assess the impact without a detailed map. If the pipeline will run along the Glenn Highway in all areas do not disturb the grave sites in Sutton. In the event that human remains are encountered, all construction activity must cease instantly and the Alaska State Troopers immediately notified.</p>	<p>The ANGDA is required to comply with Section 106 of the National Historic Preservation Act which requires review of any project funded, licensed, permitted, or assisted by the federal government for impact on significant historic properties. The SHPO has commented on this proposal and will continue to be involved as this project develops. The SHPO will review and comment on the Cultural Resource Preservation Plan, as described in response to comments 123 and 124, prior to the ADNR approving the plan.</p> <p>The ANGDA identified 25 recorded sites found in the Office of History and Archeology (OHA), Alaska Heritage Resources Survey (AHRS) within one mile of the proposed pipeline corridor. Two of these sites might be located within the proposed 300 foot construction right-of-way corridor shown on the Alignment Sheets. All sites of concern date from the historic period of human occupation. Prehistoric sites are listed in the AHRS database for this region; however, none of these sites are located in proximity to the proposed pipeline route. Additional research will be accomplished on realignments prior to obtaining authorization to begin construction.</p>

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
	<b>TRIBAL LANDS</b>	
127.	Develop an agreement with the tribal government regarding wildlife protection, fire protection, spill plans, emergency plans and any needed enhancements in the future with the consent of the Tribal government.	The ANGDA may enter into agreements with the Tribal governments regarding Tribal lands and the protection of their lands. The ADNR would not be involved in these negotiations.
128.	State should “partner” with the Tribal governments on whose lands this project proposes to cross/ trespass on.	The state does not normally “partner” with private property owners on projects where state and private lands are involved. Private property owners are responsible for negotiating terms with the proponent. The state will continue to keep the Tribe informed of actions taking place on state lands regarding this project. Additionally, the JPO website ( <a href="http://www.jpo.doi.gov">www.jpo.doi.gov</a> ) is updated as new information is submitted or decisions are made.
129.	Object to any gas pipeline right-of-way being developed without developing an agreement with the Tribal governments for lands that will be “taken” for this project. Agreement should include a revenue stream/tax/lease/return of capitol to the Tribal governments.	The ADNR thanks you for your comments. See the response to comment 127 for additional information regarding the state partnering with private property owners, including Tribal governments.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
130.	Recommend improving Permanente Road, an 11.8 mile primitive road, identified as BIA Route 4000, that goes up Kings River to use for construction of the pipeline.	The ANGDA has expressed an interest in working with the Tribal Council to utilize and improve this road during the construction of the pipeline. The ANGDA will continue to work with the Tribal Council to identify potential access roads on Tribal lands. See response to comment number 129.
	<b>STATEHOOD ACT</b>	
131.	The statehood/state of Alaska is an illegal state. The indigenous peoples (Eskimos, Indians and Aleuts) were precluded from voting for statehood. Russia did not own Alaska and only sold their “right to commerce” and the Russian improvements located on approximately 41 acres of land (forts). The indigenous peoples have never ratified/held a referenda vote on: Statehood; ANCSA; or ANILCA.	Comment is noted by ADNR.
	<b>AVAILABILITY OF GAS TO COMMUNITIES</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
132.	Put gas lines into communities along the pipeline as the line is developed. Siphon points along the line could be of intrinsic value to locally impacted communities.	Gas in the pipeline will be transported at high pressure. To be used in households or businesses along the pipeline the pressure would need to be reduced. Additionally, the natural gas would need to be “stripped” from the liquids and the unusable gases returned to the pipeline. Removing propane in Glennallen and in Palmer may be an alternative way to reduce energy costs in communities along the pipeline. Propane that is extracted in Glennallen or Palmer could be used in the area and delivered to outlying areas by truck. This should benefit the residents by reducing the cost of propane. See response to comment number 134 for additional information.
133.	Understand that natural gas in Southcentral Alaska is critical. State depends on and continues to depend on its natural resources, including gas.	Natural gas is very important to Southcentral Alaska residents. Homes and businesses use the gas for heat, the electric companies use gas to power their generators, the Agrium Plant in Nikiski uses gas to produce fertilizer, and Conoco-Phillips uses it to produce and ship Liquid Natural Gas (LNG) to Japan. The economy of Southcentral Alaska has a high dependency on natural gas.
134.	Would like to see our gas developed for the benefit of Alaskans. Encouraged the Copper Basin region may finally get some meaningful economic development opportunities as a result of lower energy costs.	The Copper Basin region could benefit from a pipeline. Propane may be extracted in the Glennallen area which may benefit the residents by reducing the cost of propane. The cost of trucking the propane to homes or outlying communities would also be reduced. Additionally, if CVEA converts their generators to natural gas, the people on their grid should benefit from lower electric costs. See response to comment number 132 for additional information.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
135.	High energy costs are often blamed as the single largest impediment to economic development in the region served by CVEA. Developing Alaska's gas reserves and delivering that resource to market from the North Slope to Southcentral Alaska and points in-between accomplishes the goal of the 2002 legislation.	Comment is noted by ADNR.
136.	Support the pipeline project and hope it will give the Copper Basin region some relief from the utilities increases.	Comment is noted by ADNR.
137.	Although the gas will be used in Anchorage, the Mat-Su Valley and points south, it will also open up possibilities for the Copper Valley, such as electrical generation from gas and the extraction of propane for local use.	Comment is noted by ADNR. See response to comment numbers 133 and 134.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
138.	Copper Valley economics are shallow and fragile because of utility costs which prohibit many kinds of economic endeavors that could be undertaken by the residents.	Should this pipeline be constructed, the extraction of propane for local use should help the communities in the Copper Valley. If the CVEA converted their generators to natural gas, the cost of producing electricity should be reduced thereby helping the local residents. With the cost reduction of electricity and propane, the Copper Valley may become economically viable for new endeavors. See responses to comment numbers 133 and 134.
139.	How will the gas line benefit the people in the area?	See responses to comment numbers 133 and 134. Additionally, lower energy costs help residents and businesses alike.
140.	The technology exists for a drop-off nipple to feed the communities along the pipeline and Enstar says it will not be a problem. An example of a drop-off from the Kenai Kachemak Pipeline is the Ninilchik Post Office. This is called a purchase point and it matches up to a Kenai distribution center.	The pipeline can be designed to have “taps” or “off-take” points. In order for natural gas to be used from the high pressure line the pressure must be reduced prior to entering a distribution line. The ADNR administers leases for common carrier pipelines under AS 38.35 and does not administer distribution lines. An off-take and/or purchase point at the Ninilchik Post Office is not a part of the State Right-of-Way Lease for the Kenai-Kachemak Pipeline. See response to comment numbers 132 and 134.
141.	A big area of concern relates to the cumulative impacts of the whole project. Do we want Mat-Su sucking on the little bit of gas available in the Copper River Basin? It would be better to use any gas locally or not at all.	The ANDGA proposes to ship North Slope natural gas in the Glennallen to Palmer pipeline. At this time there are no gas producing wells in the Copper River Basin. If wells are developed, the gas could be used in the Copper River Basin or this pipeline could transport the gas to Southcentral. That decision would be made by the gas producers and pipeline owners, not ADNR.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
142.	Propane in a bottle does not compare to natural gas in the ground year round.	The convenience of having gas in the form of Natural Gas Liquids (NGL) piped to a business or residence is more convenient than transporting and filling propane bottles. Having propane delivered would be similar to having a natural gas line. See response to comment numbers 132 and 134.
143.	If the cost of propane went down, then it may help the communities along the line. The pipeline will not benefit the communities along the pipeline.	The benefit to communities along the pipeline could be the reduced cost of propane. Distribution of Natural Gas Liquid (NGL) products such as propane to local markets is typically accomplished via a truck loading rack utilizing flexible hose connections. Trucks then deliver propane to customers along their route. See response to comment numbers 132 and 134.
144.	Gas shortages in Southcentral are expected to happen as early as 2009 so we need to prepare to address this shortage.	The State is aware of impending gas shortages in Southcentral Alaska. The ANGDA is working with the ADNR to obtain a right-of-way to construct the spur line from Glennallen to Anchorage in response to this shortage. See response to comment numbers 132 and 134..
145.	This infrastructure is important to the Glennallen area from the standpoint of lowering the cost of electricity. The utility currently has a number of generating sources but with the cost of oil escalating, the customers are paying more for electricity and fuel.	The costs of utilities throughout the state are increasing. This pipeline could offer a solution to the rising cost of electricity and propane to Copper Basin residents and is important to everyone along the pipeline. This pipeline could deliver natural gas to people in Southcentral Alaska, including, i.e., the Agrium plant in Nikiski and the power generation plant at Beluga.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
146.	If a compressor plant can be built in the Glennallen area, it would be a good place for inexpensive propane. People could convert their heating oil burners to propane or purchase new units. Reducing the cost of propane and electricity would be a boon for people in the Glennallen area.	The ANGDA is considering a compressor plant in the Glennallen area. This plant could be designed to reduce the pressure of the gas for use in the electric generation facility in Glennallen and could be a withdrawal point for methane and/or propane. These are two benefits the residents of the Copper Basin could see from this pipeline.
147.	Don't believe the outlying areas will get cheaper propane.	Outlying areas could see a reduced cost for propane and electricity if a compressor plant were constructed in the Copper Basin, such as in Glennallen. See response to comment number 146.
148.	Grant money is available to get a special drop for small communities. A gas distribution point could be set up in Sutton/King Mountain or for anybody that wants to start a co-op utility in their area. This would benefit the communities.	Comment is noted by ADNR.
	<b>MONITORING AND INSPECTION PROGRAMS</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
149.	<p>Inventory and monitor the following resources:</p> <ul style="list-style-type: none"> <li>- Cultural Resources;</li> <li>- Water quality in streams and wetlands;</li> <li>- Anadromous and other fish resources;</li> <li>- Trails;</li> <li>- Wetland delineation;</li> <li>- Wildlife Habitat;</li> <li>- Anadromous and other fish resources; and</li> <li>- Impact to eagles and other sensitive wildlife.</li> </ul>	<p>The Conditional Right-Of-Way Lease requires twenty-five (25) plans to address the resources. These plans may be combined into “like topics” and must be approved by the ADNR prior to initiating any ground disturbing activities. Other agencies will review the various plans prior to acceptance by ADNR. The plans that are required are: (1) Air Quality; (2) Blasting; (3) Clearing; (4) Corrosion Control; (5) Cultural Resource Preservation; (6) Environmental Briefing; (7) Erosion and Sedimentation Control; (8) Fire Control; (9) Human/Carnivore Interaction; (10) Liquid Waste Management; (11) Material Exploration and Extraction (12) Oil and Hazardous Substances Control, Cleanup and Disposal (13) Overburden and Excess Material Disposal; (14) Pesticides, Herbicides and Chemicals; (15) Pipeline Contingency; (16) Quality Assurance/Quality Control; (17) Restoration (18) River Training Structures; (19) Seismic; (20) Solid Waste Management: (21) Stream, River and Floodplain Crossings; (22) Surveillance and Maintenance; (23) Visual Resources; (24) Water Quality Monitoring; and (25) Wetlands Construction.</p>
150.	<p>Require a thorough applicant-funded, agency-implemented monitoring regime. This should include:</p> <ul style="list-style-type: none"> <li>- Baseline</li> <li>- Performance</li> <li>- Effectiveness monitoring.</li> </ul>	<p>Common carrier pipelines are overseen by the ADNR. ADNR, including OHMP, will develop surveillance and monitoring program(s) for the pipeline. The cost of administering and conducting surveillance and monitoring of the pipeline will be borne by the ANGDA.</p>

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
151.	DNR should stipulate that ANGDA provide for inspectors on site during construction to monitor the areas mentioned under Criteria 3 of the Commissioner's Analysis and Proposed Decision. Developing plans is no indication of the authority's ability to prevent damage.	Quality Control and Quality Assurance inspectors will be on site during construction of the pipeline. The plans discussed in response to comment number 149 are one of many tools ADNR and other agencies use to ensure the use of best construction, operation and maintenance practices. These plans will be written to address the construction, operation and maintenance phases of the pipeline. Termination activities will be addressed in the future.
152.	Helicopter patrols will take place up and down the pipeline, which is what they do over existing pipelines.	Helicopter patrols are one of many methods and safety features that will be used in addition to on-ground inspections. Other safety features and controls that will be used to protect public and private property will include, but are not limited to valve inspections, pipeline operating and maintenance procedures, emergency plans, employee training, and inspection plans.
	<b>JOBS AND LOCAL HIRE</b>	
153.	Hire local people to monitor the streams, water quality and impacts on the trails.	The ANGDA may hire qualified individuals to perform monitoring. If the ADNR contracts out the work, the final document (report) is subject to approval by the ADNR. See response to comment number 154.
154.	Opposed to the pipeline but if it goes through would like to see some benefit to the locals such as employment for monitoring purposes.	The ADNR can not require the ANGDA to hire locals for monitoring purposes. The ANGDA has indicated their intent to work with local organizations and selected communities to provide vehicles, health care equipment and supplies, training and emergency response so the locals are capable of responding to medical emergencies that may occur during construction and after construction. The ANGDA may expand its desire to work with locals who are qualified and available.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
155.	Support the line but don't support the time it is going to take under the current plan. People are going to be leaving Alaska in droves because you can't afford to heat your house or afford to live here. Senior citizens can't afford to heat their homes. People in the Interior are stealing fuel oil from each other just to keep their houses warm.	<p>The ANGDA construction schedule will be driven by the earliest and expected start date. Project management and scheduling is based on the concept of pre-building the Palmer to Glennallen spur line to: (1) connect to the proposed Alaska Gasline Port Authority (Port Authority) pipeline that would pass through Glennallen enroute to Valdez; (2) tie-in at Delta to the proposed pipeline to Alberta or Chicago; or (3) build a pipeline from Glennallen to either Prudhoe Bay or Pt. Thompson.</p> <p>Construction of the pipeline is expected to take 12 to 24 months. Construction of the terminus facility will be timed so its completion coincides with the completion of the pipeline. Landscaping and restoration will be completed after construction and when the weather or restoration technique is most suitable for these activities.</p>
156.	We are hurting for jobs. How many jobs are created from the gas and oil industry?	In 2005, there were approximately 8,700 oil and gas related jobs in Alaska. The Department of Revenue expects that with the continued high oil prices (\$50-plus per barrel), the forecast for modest growth in Anchorage and more rapid growth on the North Slope for employment in the oil and gas industry. Construction of this pipeline could create about 620 direct pipeline jobs. This number would reduce when the pipeline is operational. See response to comment number 157.
157.	Project won't offer any benefits to the locals.	The overall benefits to the residents of the State of Alaska will be new jobs during construction, with some jobs remaining during the operation and maintenance phase, increased Permanent Fund, increased jobs in other fields (not in the oil and gas industry), such as retail, wholesalers, service industry, tourism, etc. The state and local unions have ongoing training programs to qualify individuals for oil and gas or construction related employment.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
158.	Establish an institution of technology which will develop medicines and material, develop the economy and world businesses and help keep some of our children here. We need more jobs and to keep our industry at Nikiski going.	Creation of an institute of technology to develop medicines and materials is not part of this proposal. This pipeline could provide natural gas to the existing plant in Nikiski (Agrium) which would help retain industry and jobs in Nikiski and on the Kenai Peninsula.
	<b>TRAVEL/TOURISM INDUSTRY</b>	
159.	The travel industry is looking for another outlet for tourism. The Copper Valley is the next area to be developed. Lower propane and electric costs would help the tourism industry.	Lower utilities, such as electricity and propane, may help develop tourism in the Copper Basin. A plant in the Copper Basin could offer a number of advantages to the residents and tourists such as reduced propane for residents, businesses and motor homes.
	<b>CONSTRUCTION OF THE PIPELINE</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
160.	This is a good project and the sooner we start the ball rolling the better because it is not an overnight deal. Every month we delay costs us in the long run. This is a very important project for all of Alaska.	The State believes it is important for a pipeline to be constructed to get Alaska's gas to market. This pipeline proposal would benefit the people of Alaska by providing Alaska's gas for Alaskans.
161.	Private enterprise should develop a gas line, not a state agency. The State's development history is terrible (Delta Barley project; grain silo in Valdez, Point Mackenzie farm project, fish processing plant).The state should be willing to work with Enstar and not try to do this project on their own.	The ANGDA has been working with Enstar and other utilities on this project and the study being done on the Parks Highway route. The ANGDA has seen its role to advance the project and has indicated a willingness to partner with knowledgeable parties and may not be part of the project in the long term. A transfer or assignment of the Right-of-Way Lease must be approved by ADNR. The assignee/transferee would acquire all lease conditions and stipulations upon approval of the transfer by ADNR.
162.	Degradation of the quality and the value of one's own land as a result of putting in the pipe line and maintaining it is a concern.	Construction of the pipeline will be based on the Design Basis, which will be based on the best technology available at the time the Design Basis is approved by ADNR. The Design Basis will address construction and maintenance of the pipeline.
	<b>EMERGENCY SERVICES</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
163.	ANGDA has mentioned the purchase of EMS/Fire Station buildings as one community project they may provide.	In the application, ANGDA states it intends to work with local organizations and selected communities to provide vehicles, health care equipment and supplies, training and emergency response so that the communities will be able to respond to medical emergencies that may occur during construction. ANGDA has indicated their intent to transfer the buildings and equipment to the communities after construction is completed. The ADNR would not be a party to these agreements and they would not be a requirement in the Right-of-Way Lease.
164.	If the pipeline is installed, would like to see increase in emergency services.	See response to comment number 163.
	<b>PIPELINE CORROSION</b>	
165.	Pipe corrosion is a concern, especially in a high pressure 24-inch pipeline.	The Conditional Right-of-Way Lease will require ANGDA submit a Corrosion Plan to the Commissioner for approval. Priority will be placed on prevention, detection and abatement of hazardous situations. A Quality Control Plan will address safe practices to safeguard the public's health and safety during construction and operations. The applicant, contractors and subcontractors will be required to comply with all applicable federal, state and local laws and regulations for public health and safety, including 49 CFR Parts 191 and 192. The federal regulations require stringent standards for pipe materials, pipe design, components, corrosion protection, testing, operation and maintenance. Eliminating or limiting opportunities for interaction between the public and construction activities will be the basis for public safety. Closely monitoring and controlling communication during pipeline construction will detect situations that may endanger public health and safety.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
166.	This line could be vacant and in the ground for ten years before gas flows from the North Slope. What are the corrosion possibilities in having a pipe in the ground for ten years prior to shipping gas?	The ANGDA has requested a Conditional Right-of-way Lease, which conveys no interest in land, property or resources of the State or any preference or priority rights to a particular right-of-way or alignment. A Conditional Right-of-Way Lease may be revoked by the Commissioner if the Commissioner determines the Conditional Lessee is not fit, willing and able to perform under a Right-of-Way Lease. Corrosion prevention is one of many things ANGDA will need to address prior to the ADNR offering a Right-of-Way Lease to ANGDA. See response to comment number 167.
167.	Constructing the spur line 10 or more years prior to gas flowing through the larger primary gas pipeline is a disaster waiting to happen. Will the state assume financial liability when residents are killed/injured as a result of external corrosion?	The spur line will be constructed in coordination with the mainline and may be built at the front end of the bigger project. Safety issues are addressed through detailed federal regulations during the design, construction and operation of the project. Liability could vest in a number of places, such as the Lessee and the steel fabricators. See responses to comment number 166.
	<b>PUBLIC COMMENT PERIOD AND WAYS TO COMMENT</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
168.	Legal notice published in the newspaper said comment period deadline was April 26, 2006. However, at the hearing the deadline was announced as April 24, 2006. Please give individuals until April 26, 2006 to comment.	Thank you for bringing this technical error to our attention. The comment period deadline was extended to 5:00 p.m., April 26, 2006.
169.	Disturbed that the department would not accept comments by e-mail which means that some people will not comment (perhaps a fair number) and will leave some people to believe that the agency is intentionally limiting the number of comments DNR will have to consider. State should be encouraging, not discouraging, public participation and comment.	Not all divisions or sections within State government, including ADNR, accept comments by e-mail. The State does encourage the public to participate and comment on projects. The State Pipeline Coordinator's Office does not accept comments via e-mail.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
170.	There is a way to deal with “spam” whether it comes in the form of e-mail, snail mail, petitions, form letters, form postcards, etc. The way to deal with electronic and paper “spam” is to consider, but discount, communication which shows a lesser lever of knowledge, time, commitment, etc. Agencies do this all the time.	The ADNR thanks you for your comments and suggestions.
171.	Extend the deadline for comments and encourage e-mail comments by distributing an address the general public can comment to.	The ADNR thanks you for your comments. The deadline for comments was extended to April 26, 2006 in response to a typographical error in the public notice.
172.	Although the application is for an unconditional lease, this is the only opportunity to comment on the conditional right-of-way lease. Therefore, we are commenting on the project as though this is an actual project and not just an exploratory phase.	Comment is noted by ADNR.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
	<b>COPPER VALLEY ELECTRIC ASSOCIATION</b>	
173.	Copper Valley Electric Association, Inc. supports the proposed spur line. CVEA provides central station electric service to a geographic area which is 200 miles east to west and 150 miles north to south. CVEA operates and maintains a primary distribution line within easements granted by DOT from Glenn Highway mileposts 109-189. Conflicts may occur between the gas line and existing facilities within the DOT RIGHT-OF-WAY. Should conflicts occur, CVEA's position is that relocation of CVEA's facilities should be done at no expense to the Cooperative's members.	Comment is noted by ADNR. The ANGDA will work with CVEA to ensure the pipeline project will not conflict with existing distribution lines.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
174.	CVEA's primary distribution line is 14,400 volts. Construction of the proposed gas line will quite possibly result in the operation of aerial equipment in areas close to energized circuits. Safety as it pertains to working in close proximity to energized electrical circuits should be clearly addressed in any lease agreement, in addition to financial responsibility for losses to persons and property.	The ADNR and ANGDA understand the dangers associated with operating aerial equipment close to energized circuits. The utmost care will be taken to ensure construction near energized circuits will be done in a safe manner.
175.	Support the conditional right-of-way lease only if gas will be used to fuel Copper Valley Electric Power generation. I would not support another pipeline, like TAPS, through the Copper Basin that does not benefit the residents.	Benefits to residents of the Copper Basin could be lower electricity by providing natural gas to fuel Copper Valley Electric Association's generators and lower cost propane.
176.	It would be only fair to financially support the transfer of power generation from diesel to gas and to support spur lines to small communities like Lake Louise.	During pipeline construction, an off-take valve could be installed near Lake Louise where a distribution line could be connected in the future. A spur line or distribution line to Lake Louise is not a part of this pipeline proposal.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
	<b>GAS LINE FROM PRUDHOE</b>	
177.	There is not a gas line in Glennallen to connect this pipeline to. You are putting the cart before the horse. Put this decision on hold until the main pipeline is more than talks of lawsuits.	The Conditional Right-of-Way Lease was applied for in anticipation of construction of a gas line from Prudhoe Bay.
178.	It makes no sense to approve a spur line for a gas line that doesn't exist. The project is a long-shot at best. The project has no value to the public unless it is actually built, which it won't be. Rights should not be given to speculators. Permits should only happen for projects that are realistically proposed to happen and to entities that actually build things. This proposal fails both those simple tests.	The granting of the Conditional Right-of-Way is an essential piece in evaluating the economic potential of the project. Dunmire Consulting prepared a report titled <i>Cook Inlet Energy Supply Alternatives Study – Final Report</i> , dated April 14, 2006, that considers the energy supply alternatives in Cook Inlet. This study shows the spur line as having high public value if the pipeline carrying North Slope gas is built through Alaska. This study is available on the JPO website, <a href="http://www.jpo.doi.gov">www.jpo.doi.gov</a> .
179.	This decision should wait until the real gas pipeline is proposed.	Comment is noted by ADNR.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
180.	This line should be tied into a direct line from Prudhoe Bay to Valdez. If we wait for the line to go through Canada, we're going to be waiting 15, 20 years and Anchorage will be out of gas.	Comment is noted by ADNR.
181.	Running a gas line through Canada is against the best interest of the State of Alaska.	Comment is noted by ADNR.
182.	Believe the pipeline from the North Slope into Canada is unlikely to happen, will not happen in time to solve Anchorage's shortages and believe its unlikely to happen in our lifetime.	Comment is noted by ADNR.
183.	Producers have announced they will not construct the Alaska gas pipeline prior to the construction of the Mackenzie Valley pipeline. Canada has its own gas reserves they insist be taken into the Alberta market prior to any gas line from Alaska.	Comment is noted by ADNR.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
184.	The gas pipeline from the North Slope to Valdez is already permitted and only needs to overcome the acquisition of gas supplies. Encourage ANGDA to do whatever they can to assist an entity in securing the gas supplies needed for a project from the North Slope to Valdez so this project into Southcentral can move forward.	The gas pipeline right-of-way from Prudhoe Bay to Valdez is a Conditional Right-Of-Way Lease. Yukon Pacific Corporation (YPC) was issued a Conditional Right-of-Way Lease in 1992. The Conditional Right-of-way Lease has not been perfected to a Right-of-Way Lease. A Conditional Right-of-Way Lease does not offer any property interest in state lands. To enter into a Right-of-Way Lease, YPC will need to show the Commissioner they are “fit, willing and able” to construct and operate the pipeline. At this time there are a number of requirements YPC has not met, including but not limited to financing of the project and an approved Design Basis.
185.	It would be the highest travesty if we allow natural gas to sit undeveloped on the North Slope and had imports coming in from another country, such as Australia.	Governor Murkowski is very interested in developing the gas reserves on the North Slope and has negotiated a draft fiscal contract in May 2006 with ExxonMobil, BP, and ConocoPhillips. The fiscal contract is subject to approval by the Alaska State Legislature.
	<b>HISTORIC / TRADITIONAL TRAILS</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
186.	The Chitna Pass and Boulder Creek area is one of the most sacred and important areas for the Chickaloon Village Tribal Citizens and is the worst place for a pipeline and the subsequent off highway vehicles. The trail is a historical trail, not an existing right-of-way. The trail was created by the feet of our Ancestors.	The ADNR recognizes the importance of historic and traditional trails around the state and worked with Congress to get the Revised Statute (RS) 2477 passed. Alaska Statute (AS) 19.30.400 lists more than 600 rights-of-way that qualified as RS 2477 rights-of-way, of varying widths, under state standards. RS 2477 rights-of-way that may be crossed or used in this project are: (1) Chickaloon – King River Road – RST 0047 and 0564; (2) Hicks Creek Trail (aka Pinochle Creek) – RST 0426; (3) Chickaloon River Trail – RST 0047; (4) Caribou Creek Trail – RST 0433; (5) Chickaloon – Knik – Nelchina – RST 0564; (6) Copper Center – Nelchina – RST 0565; (7) Squaw Creek Trail – RST 0589; (8) Slide Mountain Trail – RST 1383; (9) Belanger Pass Trail – RST 1426; (10) Startup Lakes Trail – RST 1428; (11) Old Man Creek Trail – RST 1456; (12) Lake Louise Road to Ewan Lake – RST 1511 and 1746; (13) Lost Cabin Lake Trail (Atlasta House) – RST 1540; (14) Crooked Creek Trail – RST 1601; and (15) Old Man Lake Trail – RST 1746. These trails are some of the many trails in the state that have been recognized as important transportation corridors. An application for the use of these rights-of-way must be submitted and approved by ADNR prior to use. The road right-of-way applications would be submitted under AS 38.05.850.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
187.	Division of Mining, Land and Water (DMLW) recommends the SPCO work in close cooperation with the Southcentral Region office to foster the exchange of information and to minimize negative socioeconomic and recreational impacts including the identification of third party interests associated with existing or pending road and/or trail easements that may be disrupted by project activities. A number of popular recreations trails (including over 12 validated RS2477 rights of way) in the area receive heavy use year-round but particularly during summer and fall. Permanent improvements, such as access roads to the pipeline coordination, should require consideration and mitigation to minimize impacts to these traditional uses.	The SPCO continues to work in cooperation with the DMLW. The SPCO entered into two Reimbursable Services Agreements (RSA) with DMLW; one with the Realty Services to provide limited assistance with the title report related to the ANGDA ROW application; and the other with the SCRO to research and provide the SPCO with information relating to RS 2477 rights-of-way in respect to the ANGDA Conditional Right-of-Way Lease application. The RSAs were approved in 8/2005 for FY06. The SPCO did not enter into a contract for a title report, therefore there was no review work required by Realty Services. A report on RS 2477 routes was never submitted by the SCRO. Preliminary work was accomplished by SPCO staff. The SPCO may enter into an RSA with DLWM/SCRO after the alignment is defined and more in-depth information is required.

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	<b>TRAILS AND RECREATIONAL VEHICLES (ATV AND OHV)</b>	
188.	The Mat-Su Borough already has problems with all-terrain vehicle (ATV) use on public rights-of-way and trails. Encourages DNR to mandate ANGDA fund a trail monitoring, maintenance and enforce trail rules along the pipeline corridor and all access roads or trails used for the construction and maintenance of the pipeline. Environmental problems will develop quickly without funding to maintain and monitor new trails.	<p>During construction of the pipeline the access roads may need to be two-lane to accommodate the heavy equipment and large trucks using the roads. However, after construction is completed and the ANGDA enters into the operation and maintenance phase of the operation, the road(s) may be reduced to one lane, if the Commissioner determines it to be in the best interest of the state.</p> <p>Recommendations were made to ADNR to have construction access roads designed so the road can subsequently be converted into a trail(s). These “roads-to-trails” could then be hardened paths (no wider than a one-lane road) with appropriate grade and drainage for multiple uses. It was also suggested that pullouts be constructed that can potentially double as truck turnouts. This would allow for safer passage of traffic. Specific areas identified for turnouts include: Boulder Creek/Purinton Creek trailhead, Hicks Creek/Pinochle Creek trailhead, and Squaw Creek/Belanger Pass trailhead.</p> <p>See response to comment number 1.</p>
189.	Will the natural resources of the area be managed in accordance with the inevitable increase in user activity?	The Board of Game regulates game management in the State. Should an area have increased user activity, the Board of Game may require changes in a particular game management unit.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
190.	The value of the local areas' recreational, ecological and economical resources should be weighted against the proposed route.	When a proposal is submitted to the ADNR for use of State land, the ADNR must make a determination if the project/proposal is in the highest and best interest of the state. The department looks at the resources, ecological and economic effects of the proposal when making a decision.
191.	Provision on continual funding for trail condition and use monitoring and trail restoration for the lifetime of the pipeline.	Access roads on state lands required for the construction, operation and maintenance of the pipeline will be maintained by ANGDA. Roads that are only required during construction would be restored and rehabilitated to the satisfaction of the Commissioner.
192.	Four-wheelers and four-wheel Jeep clubs do permanent ecological damage to the areas they get into.	Comment is noted by ADNR.
	<b>FAULTS</b>	
193.	Proposed pipeline is within a geophysical hazard area.	Project studies will consider the soil characteristics, slopes, geological features, surface and sub-surface drainage, water tables, and floodplains in the area. The results of the studies will be used for the final pipeline design and alignment. See response to comment number 194.

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194.	Pipeline runs across major faults and will destroy many ecosystems, with the potential for destruction of millions of acres of state and private lands.	URS was retained by the ANGDA to conduct a geologic study and conceptual engineering design of fault crossings along the proposed natural gas pipeline from Glennallen to Palmer. The final report, dated October 2005, is available on-line at <a href="http://www.jpo.doi.gov">www.jpo.doi.gov</a> . This report states the pipeline potentially crosses active faults at five locations in the Chitna and Boulder Creek valleys between about pipeline MP 84 and MP 103: the Caribou fault (two separate crossings) consists of two splays of the Caribou fault and the Castle Mountain fault. Approximately 3.6 miles of the proposed route crosses mapped fault zones. The proposed pipeline route falls within about 6.6 miles of fault related zones of uncertainty. The pipeline will be designed to consider the ground displacement at the fault crossings and ensure that the stress and strain values of the pipeline are within the allowable limits based on the performance criteria established for the pipeline.
	<b>DENY CONDITIONAL LEASE</b>	
195.	Urge you not to issue the lease or right-of-way.	Comment is noted by ADNR.
196.	Deny the ANGDA application because there will be few benefits associated with the right-of-way and the eventual construction of the pipeline but will have the detriments, negative impacts of construction and the pipeline.	Comment is noted by ADNR.
	<b>MATERIAL SITES</b>	

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197.	Material areas (gravel pits) along the route have not been delineated yet. People in the neighborhood should have access to that information because it can be a significant thing.	Material areas (gravel pits) on state land have not been applied for at this time. When the applications are submitted to ADNR under AS 38.05, the public process will be started, giving the public an opportunity to comment on the proposal(s). Adjacent property owners will be notified during the public comment period.
	<b>QUALITY ASSURANCE PLAN</b>	
198.	The Quality Assurance Plan should provide for monitoring and assessment for the lifetime of the project, not just during and immediately after construction.	A Quality Assurance Plan is a requirement in the Conditional Right-of-Way Lease. This plan will address the surveillance and monitoring required during the life of the pipeline, not just during construction. Surveillance and monitoring will also be a requirement in the Right-of-Way Lease.
	<b>TRANS-ALASKA PIPELINE</b>	
199.	At this time, there is not enough information on the project to determine if the proposed original location presents concerns for TAPS integrity or safety.	Comment is noted by ADNR.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
	<b>HERBICIDES, PESTICIDES AND OTHER CHEMICALS</b>	
200.	Use of broadcast herbicides, pesticides and other chemicals such as anti-corrosion chemicals, will be a health hazard to the local people, the environment and riparian areas and will impact the local water shed and clean water supplies.	A plan addressing use of pesticides, herbicides and chemicals is required in the Conditional Right-of-Way Lease. The plan will provide the criteria and basic methodology to develop a comprehensive management program for the control, use, cleanup and disposal of pesticides, herbicides and chemicals used during the construction and operation of the pipeline.
201.	Require revegetation; prohibit use of herbicides for clearing.	Revegetation of disturbed area will be a requirement in the Right-of-Way Lease. See response to comment 200 for additional information.
	<b>STATE LAND</b>	
202.	The proposed pipeline is on public land thus has a lower probability of negative interactions and conflicts.	Comment is noted by ADNR.
203.	It is our responsibility to be good stewards of the land.	Comment is noted by ADNR.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
204.	Just because something is classified as multiple use doesn't mean you have to make it easy for people to get under.	Alaska statutes require the ADNR to manage state lands for multiple use. AS 38.04.900 defines "multiple use" as <i>"the management of state lands and its various resource values so that it is used in the combination that will best meet the present and future needs of the people of Alaska, making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; it includes (A) the use of some land for less than all of the resources; and (B) a combination of balanced and diverse resource uses that takes into account the short-term and long-term needs of present and future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values."</i>
205.	One valley along the road systems needs to remain wild and natural for future generations.	This is a buried pipeline. After construction is completed, the area will be revegetated and returned to a natural state.
206.	It's important this project move forward and hopefully bring gas down the Richardson corridor which has tremendous economic development benefits for the Copper River Basin and the State as a whole.	Comment is noted by ADNR

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
207.	The junction of the Glenn and Richardson Highways is the only place in the state you can connect with five major highways in one spot. It's the cross roads of the transportation system on the eastern side of the state.	Comment is noted by ADNR.
	<b>ENVIRONMENTAL REVIEW</b>	
208.	Condition the lease/right-of-way on thorough environmental review. Environmental problems should be dealt with first in order of priority. They should not be left to vague "mitigation" down the line.	The Right-of-Way Lease and Stipulations will be based on environmental and other reviews accomplished during the term of the Conditional Right-of-Way Lease. The requirements in the lease will be specific. Prior to beginning any construction activities the ANGDA must obtain a Notice to Proceed which will have stipulations and conditions for construction activities.
209.	ANGDA submitted an incomplete environmental study. They admit it will affect the moose population and have no idea what water quality affects will have on trout, salmon and people along the route.	The Conditional Right-of-Way Lease does not offer the ANGDA a property interest. Additional studies will be done by ANGDA during the term of the Conditional Right-of-Way Lease to determine the affect the pipeline may have on many things, including, but not limited to, wildlife, fish, and water quality.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
210.	Natural gas is the fuel of the future until we get exotic things going. The pipeline will have little environmental impact once it is built and the people will reap great rewards.	Comment is noted by ADNR.
211.	Urge the State to provide funding and technical resources needed to use this gas for Alaskans who are not recipients of P.C.E and not part of the rail belt energy system.	The ANGDA application for the Conditional Right-of-Way Lease does not include a plan to provide funding or technical resources for the use of the gas by Alaskans. There may be grants available to individuals, groups or co-ops to obtain access to gas or other energy systems.
	<b>STATE OWNED AND CONSTRUCTED PIPELINE</b>	
212.	Why doesn't the state buy the pipeline and build it with the 32 billion we have in the bank. If it's a good deal for the oil companies why wouldn't it be a good deal for the State? The State would hire other people to do our research and development, such as Anadarko. We don't have to hire the larger companies (BP, Shell Oil).	The state could construct the pipeline, either this spur line or the main pipeline. This is a possibility but is not a part of the ANGDA proposal.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
213.	If oil companies can make a profit, why can't we?	This is not a part of the ANGDA proposal. Additionally, the state is currently not in the business of buying and selling natural gas.
214.	Develop Alaska resources for Alaskans.	Comment is noted by ADNR.
215.	Keep our resources within the state. The state needs to control its resources or we are just at the will of the people of the Lower 48.	Comment is noted by ADNR.
	<b>FEDERAL LAND and ENVIRONMENTAL IMPACT STATEMENT</b>	
216.	It appears an Environmental Impact Statement (EIS) would be necessary since the route crosses BLM land and requires federal permits. The state should link its right-of-way to the EIS in the interests of a more comprehensive review.	The ANGDA has not applied to the BLM for the use the federal lands. The federal lands referenced have been selected by the state. It is not known if these lands will be transferred to the state prior to the ANGDA entering into a Right-of-Way Lease with the state. If the lands are transferred to the state, the Conditional Right-of-Way Lease could be amended to include those lands. A separate Federal EIS is required if the lands are not transferred to the state. Additionally, the ANGDA would need to apply to BLM for a Grant of Right-of-Way for use of these lands.

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
217.	Building the proposed gas line could cause substantial environmental impacts that are not being adequately represented. Greatest area of concern is around Chickaloon where it veers off the highway and enters a high habitat and recreation value area that should be conserved. A route that follows the highway would be vastly preferable.	Comment is noted by ADNR.
	<b>WASTEWATER DISPOSAL</b>	
218.	The Matanuska-Susitna Borough would like to be apprised of any wastewater disposal.	The Matanuska-Susitna Borough will be offered the opportunity to comment on applications within the Borough boundaries that are submitted for this project, including wastewater permits.
	<b>COMMUNITY AND BOROUGH PLANS</b>	

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
219.	<p>The proposed alignment is incongruent with the goals listed in the community plans that were not mentioned in the list of management plans and should be taken into account while considering the superior public interest:</p> <p>Sutton Comprehensive Plan (April 2000) states <i>“It is the desire of the community to preserve the residential qualities that have made Sutton such an attractive place to live....”</i></p> <p>Chickaloon Community Plan states <i>“Encourage the preservation of the rural character of the community.....”</i></p>	<p>The Sutton Comprehensive Plan (April 2000) was not referenced in the Commissioner’s Analysis and Proposed Decision (February 24, 2006) but is included, by reference, in the Commissioner’s Final Decision to which this document is a part. The plan does not specifically discuss pipeline construction. However, it does discuss public access with a recommendation to reroute access from private property whenever possible; negotiate with private landowners to obtain voluntary dedications of public access; encourages fund raising efforts by local organizations to provide for the expense of obtaining dedicated access; and work to identify financial incentives, such as tax deductions or other measures, that may encourage property owners to dedicate a trail. It also discusses trail degradation from overuse or misuse and supports designing, constructing, and designing new trails for minimum impact human powered activities such as hiking, biking and skiing. It has specific recommendations for the Kings River Trail, Young Creek Trail/Chain Lakes Trail, Moose Creek Trail, other Sutton trails and paved trails. The ANGDA project could be an opportunity to have trails improved in a manner that would comply with the Sutton Comprehensive Plan. It could also be a means to get some community roads improved by developing turnabouts or constructing through streets or loops to make existing dead end roads accessible for emergency equipment and, therefore, safer for the residents.</p> <p>The Chickaloon Community Plan (April 1991, amended 1995) encourages preservation of the rural character of the community. It also encourages projects that provide diverse recreation opportunities; recommends relocation of trails, as necessary, to avoid conflicts with private property; where possible, develop and maintain snow machine, mushing and skiing trails. This project could be an opportunity for the community to develop recommendations made in the plan.</p>

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	<b>COMMENT</b>	<b>DEPARTMENT OF NATURAL RESOURCES (ADNR) RESPONSE</b>
220.	Project or action must comply with all rules applicable to special land use districts or geographic areas affected, including but not limited to MSB Titles 15, 16, and 17.	Comment is noted by ADNR.
221.	Project or action must comply with all rules applicable to the affected uses, activities, habitats, and resources, including but not limited to requirements of the ADNR, ADEC, ADFG, U.S. COE and U.S. EPA. A Coastal Management Plan consistency determine by the State of Alaska may also be required.	Comment is noted by ADNR.
222.	Any changes in the execution of this project from the proposal reviewed for this decision will void this decision and will constitute cause for further review and/or initiation of enforcement actions against violations of borough, state, or federal ordinances.	AS 38.35.050 allows the applicant to amend their application. If the amendment is a substantial change to the project the change is subject to the provisions that apply to the original application. Substantial change is defined as: (1) a net increase that exceeds 10 percent of the amount of acreage in the original application; (2) change in the design of the pipeline that would use less effective environmental or safety mitigation measures or less advanced technology than proposed in the original application; and (3) a fundamental change in the general route, which would include the origin or terminus, as set out in the original application.